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January 14, 2025

Via email: [jason@binnall.com](mailto:jason@binnall.com)

Jason Greaves  
Binnall Law Group  
717 King St. Ste 200  
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Re: *Lewis et al. v. Abramson*, Case No. 1:22-cv-126-PB

Dear Attorney Greaves:

I am writing in connection with Plaintiffs' Objections to Defendant's Second Set of Interrogatories. As you know, these interrogatories requested that Plaintiffs describe in detail their efforts to search for and preserve documents relating to this lawsuit. Because the Court recently granted an extension of the discovery deadline, we anticipate Plaintiffs will adhere to your prior assurance that substantive responses would be provided (i.e., "If the Court grants a discovery extension, Plaintiffs will respond accordingly.").

I would also like to proactively address one concern. Plaintiffs have objected to multiple interrogatories—Nos. 3, 4, 6, 8, 9—on the basis that those interrogatories call for a legal conclusion. Not so. These interrogatories do not ask your clients about what the law states. Nor do these interrogatories ask your clients to opine on the legal significance of actions. Hence we will regard your clients' failure to respond to these interrogatories because they seek "legal conclusions" as insufficient to satisfy the requirements of the rules of procedure.

Lastly, Attorney Sackman sent you a letter on December 9, 2024 outlining remaining substantial deficiencies with Plaintiffs' document production and discovery responses. Plaintiffs have not responded to that letter or otherwise addressed those remaining deficiencies. Please provide a response to that letter so that the parties can attempt to resolve these remaining discovery issues without court involvement.

Melick & Porter, LLP  
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I am available to discuss any of the issues raised in this letter. And I expect that we will resolve any issues without the need for court involvement. Thank you for your anticipated cooperation.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Christian Hinrichsen", is written over a light blue horizontal line.

Christian H. Hinrichsen